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November 12, 2021

Docket Management Facility
US Department of Transportation
1200 New Jersey Avenue
SE West Building Ground Floor Room W12-140
Washington, DC 20590

Petition for Exemption Extension – Regulatory Docket No. FAA-2019-0913

Dear Sir/Madame,

Soloy Helicopters LLC is requesting an exemption extension to continue to improve the safety of Human External Cargo (hereinafter referred to as HEC) operations by utilizing a BK117 Category A, multi-engine rotorcraft for HEC operations. We seek this extension to the granted exemption based on the same guidance and provisions set forth previously in the approval.

Per the instructions of 14 CFR 11.81, the following information is provided to support the exemption extension request.

14 CFR 11.81 (a)

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14 CFR 11.81 (b)

I seek an extension of the relief from 14 CFR 133.43 (a) and (b) in regards to equipment used for Class B HEC operations.

I seek an extension of the relief from 14 CFR 91.9 (a) applicable to Onboard Systems Cargo Hook P/N 528-028-00 installed with Airworks cargo hook installation STC SR02492SE and SR02492SE RFMS.

14 CFR 11.81 (c)

Soloy Helicopters requests an extension of the maximum relief allowed by law. Until a system that meets all of the standards in 14 CFR part 27.865 is approved.

Reason for relief from 14CFR 133.43 (a) and (b) and 14CFR 91.9 (a):

Soloy Helicopters operates 3 BK117 rotorcraft under 14 CFR 133.35 and has applied to carry flight crewmembers necessary to accomplish the work activity directly associated with that operation. These operations fall under Class B external loads as defined in AC 133-1B. The primary purpose of these Class B operations is to maintain and repair the United States electrical grid primarily in (but not limited to) the state of Alaska.

At this time there are no rotorcraft cargo hooks that are available for the BK117 that meet the HEC requirement of 27.865 or 29.865. Relief from 133.43 (a) and (b) for HEC purposes will give Soloy Helicopters the ability to work towards a solution for this issue.

Reason for relief from 91.9 (a):

Soloy Helicopters would like to utilize the BK117 for HEC operations but the aircraft was certified under 14 CFR Part 29 and utilized primarily as a medevac helicopter. As such there is currently not an approved belly hook that meets 14 CFR 29.865 for HEC operations. The currently approved cargo hook for the BK117 has a non-human limitation listed in the RFMS.

Soloy Helicopters would like to continue using Onboard Systems Cargo Hook P/N 528-028-00 installed with Airworks cargo hook installation STC SR02492SE and SR02492SE RFMS until alternative methods of compliance are available.

See attachments for AC-1331B and applicable STC's.

14 CFR 11.81 (d)

Soloy Helicopters currently utilizes 18 helicopters that support private and parapublic operations including wildland firefighting and powerline/electrical grid inspection. Human External Cargo is an essential operation for the repair and access of the power line infrastructure especially in the event of a natural disaster or damaging storm.

We would also like to expand our capability for Class B HEC operations to aid local, state, and federal Wildland Firefighting, Law Enforcement and SAR operations. We frequently have aviation assets located in remote areas of Alaska that could provide essential services in the support of Law Enforcement or SAR operations, especially with the addition of Class B HEC capability.

We recognize that the current equipment is a safe and effective method to conduct Class B HEC operations despite not being compliant with 27.865. If a compliant system is created, certified, available at an acceptable price point and reasonable time frame, and improves the safety of our HEC operations, we will gladly pursue that system.

14 CFR 11.81 (e)

There are currently multiple operators approved for exemptions for conducting 14 CFR 133 Class B HEC utilizing equipment that is not approved under 27.865. We would like to utilize the same equipment and PSD (belly-band backup attachment) that other operators currently have exemptions for using for their HEC operations and that is recommended in FAA AC-133-1B. The belly-band covers the HEC dual-action requirement of 27.865 for the quick release system. This PSD system is currently in use by many public and private operators.

Soloy Helicopters follows all limitations and ICAS for PSD (belly-band), short haul ropes and crewmember harnesses. The BK117 external cargo hook is rated to 2646lbs. By limiting HEC loads to 1300lbs or less the cargo hook exceeds the static load limitations outlined in 27.865 (a) by achieving a static load limitation of 5. This also provides a greater than 7:1 safety factor for the PSD.

Soloy Helicopters provides training for all pilots and crewmembers prior to performing HEC operations. We have recently revised our operations manual to incorporate the guidance provided by AC133-1B. See attached operations manual.

See attachments for PSD description and specifications, short haul lines, crewmember harnesses and operations manual excerpts.

14 CFR 11.81 (f)

Soloy Helicopters feels a summary need not be published in the federal register. This exemption will not set a precedent. Other exemptions have been granted for the BK117 helicopter to 14 CFR 91.9 (a) & 133.43 (a) and (b).

If a summary is deemed necessary then please use the following statement:

Soloy Helicopters LLC seeks exemption from Part 91.9(a) and 133.43(a) and (b) of 14 CFR for the BK117 series helicopter. The nature of this exemption is to be allowed to use the BK117 helicopter to perform Class "B" HEC operations. The FAA has recommended Soloy Helicopters LLC, and other operators, comply with the HEC parts of 14 CFR Part 27.865 for Class B HEC operations. The FAA has pointed to 14 CFR Part 133.43(a) and (b) as the reason operators must comply with the HEC parts of 14 CFR Part 27.865 for Class B HEC operations. Soloy Helicopters puts safety as the top priority for Class B HEC operations. Through the use of Class B HEC Soloy Helicopters can remote locations in minutes when other work methods can take hours or even days. This access is imperative for powerline construction and maintenance, Wildland Firefighting and SAR operations. Soloy Helicopters is confident that the equipment being used is providing an equivalent level of safety intended in the regulations.

14 CFR 11.81 (g)

We are requesting an extension of a previously granted exemption. An exemption was granted to Soloy Helicopters (Exemption No. 18473) utilizing the same equipment and aircraft on February 4, 2020.

14 CFR 11.81 (h)

Soloy Helicopters does not wish to exercise the privileges of this exemption outside of the United States.

Respectfully,



John Baechler
Director of Operations
Soloy Helicopters LLC